

Declaration of Alan Gottlieb
March 3, 2023

I, Alan M. Gottlieb, declare under penalty of perjury that the following statements are true and correct:

1. I founded the Second Amendment Foundation, Inc. (“SAF”) in 1974 and have overseen its operations almost continuously since then. I am familiar with all significant aspects of SAF operations.
2. SAF is a non-profit membership organization incorporated under the laws of the State of Washington. SAF’s principal place of business is in Bellevue, Washington. It is governed by a board of trustees and has members nationwide and in this district. SAF’s members voluntarily associate themselves with SAF and pay membership dues to finance SAF’s activities.
3. SAF promotes the right to keep and bear arms by supporting education, research, publications, and legal efforts about the Constitution’s right to privately own and possess firearms and the consequences of gun control. SAF has over 720,000 members and supporters, and has worked to promote Second Amendment rights throughout the United States since 1974.
4. SAF brings this action on behalf of itself. SAF also brings this action on behalf of its members because at least one of its members would have standing to sue in his own right, the interests the suit seeks to vindicate are germane to SAF’s purpose, and neither the claim asserted nor the relief requested requires the participation of individual members in the lawsuit.
5. A substantial number of SAF members have a concrete and particularized interest in the Arm Brace Rule’s treatment of brace-equipped pistols. Some these SAF members use such a firearm’s arm brace only as an arm brace because of limb-related physical disabilities that inhibit the safe and effective firearm use otherwise. Other of these SAF members do not have limb-related disabilities and use such a firearm’s arm brace only as an arm brace to facilitate safe and effective firearm use that cannot be achieved otherwise. All of these SAF members have in the past and/or would in the immediate future legally acquire from sellers such as Rainier Arms, LLC either an arm brace or a brace-equipped pistol of the kind that is currently offered. All of these SAF members are fully eligible to possess firearms under federal and state law. All of these SAF members use firearms for only traditionally lawful purposes, such as self-defense within the home.
6. For these SAF members, compliance with the Arm Brace Rule, *Factoring Criteria for Firearms With Attached “Stabilizing Braces,”* 88 Fed. Reg. 6478 (Jan. 31, 2023), causes serious and irreparable injuries no matter what compliance method occurs. For these SAF members, the NFA registration process costs are substantially injurious and irrecoverable; altering their firearms would significantly lessen their safety and/or efficacy; and worst of all, a requirement of firearm destruction or turnover would abridge their Second Amendment right to keep and bear arms.
7. I executed this declaration on March 2, 2023.



Alan M. Gottlieb